

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

- against -

GOOGLE LLC,

Defendant.

**Civil Action No. 1:23-cv-00108-
LMB-JFA**

**GOOGLE LLC's NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)
TO THE UNITED STATES**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 26 and 30(b)(6), Defendant Google, LLC, will take the oral deposition of the United States ("Plaintiff") at a date and time to be agreed upon by the parties. The deposition shall occur at the offices of Freshfields Bruckhaus Deringer US LLP, located at 700 13th Street NW, Washington, DC 20005, or as otherwise agreed to by the parties.

PLEASE TAKE FURTHER NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure, the deposition will be taken before an officer authorized to administer oaths, and will be recorded by stenographic means and on videotape. Defendants reserve the right to use the videotape of the deposition at trial.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff shall designate and produce for deposition one or more officers, directors, employees, agents or other persons to testify on its behalf regarding the topics and subject areas set forth in Exhibit A attached hereto. If the designated representative or representatives do not have such knowledge,

they are required under Rule 30(b)(6) to acquire such knowledge through whatever reasonable investigation may be necessary.

Dated: July 20, 2023

/s/ Eric Mahr

Eric Mahr (*pro hac vice*)
Julie Elmer (*pro hac vice*)
Andrew Ewalt (*pro hac vice*)
Lauren Kaplin (*pro hac vice*)
Jeanette Bayoumi (*pro hac vice*)
Claire Leonard (*pro hac vice*)
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Counsel for Google LLC

28. All documents You produced in the above-referenced litigation.

29. Your involvement and communications with any third parties concerning the Investigation and/or this Action.

30. The circumstances that led You to be involved in this lawsuit, including any efforts You undertook to investigate Your claims.

31. Your involvement and communications with any member of the United States Congress or anyone working for a member of the United States Congress concerning the Investigation and/or this Action.

32. Any facts of which You have knowledge regarding Defendant's alleged monopolization, other than those learned uniquely through interactions with counsel for the United States.

33. Your responses to Google's Interrogatories.

34. Your responses to Google's Requests for Admission.

35. All communications, including written, oral, face-to-face, telephonic, videoconference, or otherwise with any potential witness in this litigation concerning the Investigation or this Action.

36. All communications, including written, oral, face-to-face, telephonic, videoconference, or otherwise with any representative of the European Commission concerning the Investigation or this Action.

37. Communications with any individual currently employed in the Department of Justice Antitrust Division, where such communications occurred prior to the individual's employment as a member of the Antitrust Division, regarding antitrust matters concerning Google, including Google's Display Advertising business.

38. Any ethics and/or recusal guidance, advice, recommendations, waivers, authorizations, or decisions concerning Jonathan Kanter and the issue of his participation in the Department of Justice's matters involving Google's Display Advertising business.

E. Your Allegations

39. Your market share calculations as alleged in the Complaint for the alleged publisher ad server market, ad exchange alleged market, and alleged market for advertiser ad networks for open web Display Advertising.

40. The equitable remedies You seek, including any coordination or communications between You and the European Commission regarding such remedies.

41. The identity of all persons with knowledge of the subjects identified in this Notice of Deposition.